

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

**In re: BRIDGESTONE/FIRESTONE, INC.,        ) Master File No. IP 00-9373-C-B/S  
TIRES PRODUCTS LIABILITY LITIGATION ) MDL NO. 1373**  
\_\_\_\_\_)  
**THIS DOCUMENT RELATES TO ALL        )**  
**ACTIONS                                        )**

**COMPREHENSIVE CASE MANAGEMENT SCHEDULE**

The purpose of this Entry is to provide counsel with one document which they can use to reference all current case management deadlines in this MDL proceeding. This Entry does not alter any existing deadlines; rather, it simply compiles all applicable deadlines into one place for easier reference.

For case management purposes, the cases in this MDL have been divided into two categories. The first category consists of those cases which are not subject to a motion to dismiss on forum non conveniens grounds. The second category consists of those cases that are subject to a motion to dismiss on forum non conveniens grounds—in general, cases in which the plaintiff is not a U.S. citizen and in which the relevant accident or incident occurred outside of the United States.<sup>1</sup>

The two categories of cases are further divided into subcategories based upon the date the case was filed (i.e. the file was opened) in this court. All cases filed on or before June 30, 2001, are grouped together for case management purposes. Cases filed on or after July 1, 2001, are grouped together according to the calendar quarter in which they were filed, and all cases filed within a given calendar quarter have the same deadlines.

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<sup>1</sup>A few cases in which the defendants filed, and then withdrew, a forum non conveniens motion after determining that the plaintiff was a U.S. citizen also fall into this category.

Therefore, in order to find the deadlines applicable to a particular case, you must first determine whether it is subject to a forum non conveniens motion, and therefore whether it belongs in Category 1 (not subject to a forum non conveniens motion) or Category 2 (subject to a forum non conveniens motion). You must then determine the date the case was opened in this Court, and note the calendar quarter into which that date falls. Then look below to find the appropriate case management schedule. If you are viewing this Entry on the Court's website, you may click on the appropriate hyperlink below to see a calendar setting forth the deadlines for your case.

**I. DEADLINES FOR CATEGORY 1 CASES (CASES NOT SUBJECT TO A FORUM NON CONVENIENS MOTION)**

A. [For Cases Filed on or before June 30, 2001:](#)

1. The parties shall exchange lists identifying expert witnesses and the topics on which they may offer expert testimony on or before **January 24, 2002**;
2. Discovery (with the exception of discovery related to expert witnesses) shall be completed by **February 1, 2002**;
3. The plaintiffs shall serve their expert witness reports by **February 25, 2002**; the defendants shall serve their expert witness reports by **March 27, 2002**;
4. The parties shall exchange lists identifying supplemental experts who will offer expert opinions on topics for which another party has identified an expert, but for which the supplementing party has not yet identified an expert, by **February 25, 2002**;

5. The parties' supplemental expert witness reports shall be served by **March 27, 2002**;
  6. Discovery related to those expert witnesses whose opinions will be relevant to motions for summary judgment shall be completed by **April 11, 2002**; all remaining discovery related to expert witnesses shall be completed by **May 29, 2002**.
  7. Motions for summary judgment shall be filed by **April 15, 2002**, and shall be briefed in accordance with Local Rule 56.1. Therefore, responses shall be filed within 30 days of the motions (**May 15, 2002**) and replies shall be filed within 15 days of the responses (**May 30, 2002**).
- B. [For Cases Filed between July 1, 2001, and September 30, 2001 \(3<sup>rd</sup> Quarter 2001\):](#)
1. “Core discovery”<sup>2</sup> shall be completed by February 1, 2002;
  2. Case specific discovery (with the exception of discovery related to expert witnesses) shall be completed by **April 30, 2002**;
  3. The parties shall exchange lists identifying expert witnesses and the topics on which they may offer expert testimony on or before **March 1, 2002**;
  4. The plaintiffs shall serve their expert witness reports by **April 1, 2002**; the defendants shall serve their expert witness reports by **May 1, 2002**;
  5. The parties shall exchange lists identifying supplemental experts who will

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<sup>2</sup>Core discovery refers to liability discovery that is applicable to all cases. As a general rule, it is assumed that the core discovery conducted by the plaintiffs in the pre-July 2001 group of cases will be utilized by plaintiffs in later-filed cases; leave of court may be sought if a plaintiff believes an exception to this rule is warranted in his or her case.

offer expert opinions on topics for which another party has identified an expert, but for which the supplementing party has not yet identified an expert, by **April 1, 2002**;

6. The parties' supplemental expert witness reports shall be served by **May 1, 2002**;
7. Discovery related to those expert witnesses whose opinions will be relevant to motions for summary judgment shall be completed by **May 16, 2002**; all remaining discovery related to expert witnesses shall be completed by **July 3, 2002**.
8. Motions for summary judgment shall be filed by **May 20, 2002**, and shall be briefed in accordance with Local Rule 56.1. Therefore, responses shall be filed within 30 days of the motions (**June 19, 2002**) and replies shall be filed within 15 days of the responses (**July 5, 2002**).

C. [For Cases Filed between October 1, 2001, and December 31, 2001 \(4<sup>th</sup> Quarter 2001\)](#):

1. "Core discovery"<sup>3</sup> shall be completed by **February 1, 2002**;
2. Case specific discovery (with the exception of discovery related to expert witnesses) shall be completed by **July 31, 2002**;
3. The parties shall exchange lists identifying expert witnesses and the topics on which they may offer expert testimony on or before **June 3, 2002**;
4. The plaintiffs shall serve their expert witness reports by **July 1, 2002**; the

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<sup>3</sup>See definition of "core discovery" above.

defendants shall serve their expert witness reports by **August 2, 2002**;

5. The parties shall exchange lists identifying supplemental experts who will offer expert opinions on topics for which another party has identified an expert, but for which the supplementing party has not yet identified an expert, by **July 3, 2002**;
6. The parties' supplemental expert witness reports shall be served by **August 2, 2002**;
7. Discovery related to those expert witnesses whose opinions will be relevant to motions for summary judgment shall be completed by **August 19, 2002**; all remaining discovery related to expert witnesses shall be completed by **October 4, 2002**.
8. Motions for summary judgment shall be filed by **August 23, 2002**, and shall be briefed in accordance with Local Rule 56.1. Therefore, responses shall be filed within 30 days of the motions (**September 23, 2002**) and replies shall be filed within 15 days of the responses (**October 8, 2002**).

D. For Cases Filed between January 1, 2002, and March 31, 2002 (1<sup>st</sup> Quarter 2002):

1. "Core discovery"<sup>4</sup> shall be completed by **February 1, 2002**;
2. Case specific discovery (with the exception of discovery related to expert witnesses) shall be completed by **October 31, 2002**;
3. The parties shall exchange lists identifying expert witnesses and the topics

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<sup>4</sup>See definition of "core discovery" above.

on which they may offer expert testimony on or before **September 3, 2002**;

4. The plaintiffs shall serve their expert witness reports by **October 3, 2002**;  
the defendants shall serve their expert witness reports by **November 4, 2002**;
5. The parties shall exchange lists identifying supplemental experts who will offer expert opinions on topics for which another party has identified an expert, but for which the supplementing party has not yet identified an expert, by **October 3, 2002**;
6. The parties' supplemental expert witness reports shall be served by **November 4, 2002**;
7. Discovery related to those expert witnesses whose opinions will be relevant to motions for summary judgment shall be completed by **November 19, 2002**; all remaining discovery related to expert witnesses shall be completed by **January 8, 2003**.
8. Motions for summary judgment shall be filed by **November 25, 2002**, and shall be briefed in accordance with Local Rule 56.1. Therefore, responses shall be filed within 30 days of the motions (**December 26, 2002**) and replies shall be filed within 15 days of the responses (**January 10, 2003**).

**II. DEADLINES FOR CATEGORY 2 CASES (CASES SUBJECT TO A FORUM NON CONVENIENS MOTION)**

**A. For Cases Filed on or before June 30, 2001:**

1. The parties shall exchange lists identifying “core” expert witnesses<sup>5</sup> and the topics on which they may offer expert testimony on or before **March 1, 2002;**
2. Case-specific (i.e. non-core) discovery (with the exception of discovery related to expert witnesses) shall be completed by **July 1, 2002;**
3. The plaintiffs shall serve their core expert witness reports by **April 1, 2002;** the defendants shall serve their core expert witness reports by **May 1, 2002;**
4. The parties shall exchange lists identifying case-specific (i.e. “non-core”) expert witnesses and the topics on which they may offer expert testimony on or before **April 15, 2002;**
5. The plaintiffs shall serve their non-core expert witness reports by **May 15, 2002;** the defendants shall serve their non-core expert witness reports by **June 17, 2002;**
6. The parties shall exchange lists identifying supplemental experts who will offer “non-core” expert opinions on topics for which another party has identified an expert, but for which the supplementing party has not yet identified an expert, by **May 15, 2002;**

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<sup>5</sup>“Core” expert witnesses are those expert witnesses whose testimony is applicable to all cases.

7. The parties' supplemental non-core expert witness reports shall be served by **June 17, 2002**.

B. For Cases Filed between July 1, 2001, and September 30, 2001 (3<sup>rd</sup> Quarter 2001):

1. The parties shall exchange lists identifying “core” expert witnesses<sup>6</sup> and the topics on which they may offer expert testimony on or before **March 1, 2002**;
2. Case-specific (i.e. non-core) discovery (with the exception of discovery related to expert witnesses) shall be completed by **July 1, 2002**;
3. The plaintiffs shall serve their core expert witness reports by **April 1, 2002**; the defendants shall serve their core expert witness reports by **May 1, 2002**;
4. The parties shall exchange lists identifying case-specific (i.e. “non-core”) expert witnesses and the topics on which they may offer expert testimony on or before **April 30, 2002**;
5. The plaintiffs shall serve their non-core expert witness reports by **May 30, 2002**; the defendants shall serve their non-core expert witness reports by **July 1, 2002**;
6. The parties shall exchange lists identifying supplemental experts who will offer “non-core” expert opinions on topics for which another party has identified an expert, but for which the supplementing party has not yet

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<sup>6</sup>See definition of “core” expert witness above.



identified an expert, by **May 30, 2002**;

7. The parties' supplemental non-core expert witness reports shall be served by **July 1, 2002**.

C. [For Cases Filed between October 1, 2001, and December 31, 2001 \(4<sup>th</sup> Quarter 2001\)](#):

1. The parties shall exchange lists identifying “core” expert witnesses<sup>7</sup> and the topics on which they may offer expert testimony on or before **May 31, 2002**;
2. Case-specific (i.e. non-core) discovery (with the exception of discovery related to expert witnesses) shall be completed by **September 30, 2002**;
3. The plaintiffs shall serve their core expert witness reports by **July 1, 2002**; the defendants shall serve their core expert witness reports by **July 31, 2002**;
4. The parties shall exchange lists identifying case-specific (i.e. “non-core”) expert witnesses and the topics on which they may offer expert testimony on or before **July 31, 2002**;
5. The plaintiffs shall serve their non-core expert witness reports by **August 30, 2002**; the defendants shall serve their non-core expert witness reports by **September 30, 2002**;
6. The parties shall exchange lists identifying supplemental experts who will offer “non-core” expert opinions on topics for which another party has

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<sup>7</sup>See definition of “core” expert witness above.

identified an expert, but for which the supplementing party has not yet identified an expert, by **August 30, 2002**;

7. The parties' supplemental non-core expert witness reports shall be served by **September 30, 2002**.

D. For Cases Filed between January 1, 2002, and March 31, 2002 (1<sup>st</sup> Quarter 2002):

1. The parties shall exchange lists identifying “core” expert witnesses<sup>8</sup> and the topics on which they may offer expert testimony on or before **September 3, 2002**;
2. Case-specific (i.e. non-core) discovery (with the exception of discovery related to expert witnesses) shall be completed by **January 3, 2003**;
3. The plaintiffs shall serve their core expert witness reports by **October 3, 2002**; the defendants shall serve their core expert witness reports by **November 4, 2002**;
4. The parties shall exchange lists identifying case-specific (i.e. “non-core”) expert witnesses and the topics on which they may offer expert testimony on or before **October 31, 2002**;
5. The plaintiffs shall serve their non-core expert witness reports by **December 4, 2002**; the defendants shall serve their non-core expert witness reports by **January 3, 2003**;
6. The parties shall exchange lists identifying supplemental experts who will offer “non-core” expert opinions on topics for which another party has

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<sup>8</sup>See definition of “core” expert witness above.

identified an expert, but for which the supplementing party has not yet  
identified an expert, by **December 2, 2002**;

7. The parties' supplemental non-core expert witness reports shall be served  
by **January 2, 2003**.

ENTERED this \_\_\_\_\_ day of January 2002.

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V. Sue Shields  
United States Magistrate Judge  
Southern District of Indiana

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